IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	
	§	**CRIMINAL NO: 4:07-CR-00065**
JOEL HERNALDO PAREDES-GOMEZ	§	
	§	
	§	

UNOPPOSED MOTION FOR CONTINUANCE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, JOEL HERNALDO PAREDES-GOMEZ, et al, by and through his attorney of record WENDELL A. ODOM, JR.**,** and would request this honorable Court grant a continuance in this cause and for grounds thereof would show the Court the following:

I

The case is set for sentencing on Friday, November 9, 2012 at 10:00 a.m.

II

Counsel would show that this case is a complex multiple division and multiple district case involving Conspiracy to Distribute for the Purpose of Unlawful Importation of More than 5 Kilograms of Cocaine and Distribution for Purpose of Unlawful Importation of Cocaine in violation of U.S.C. 21 § 959 (a) 960, 9 and 18.

III

The co-defendants in this cause have pending motion's to continue sentencing. Counsels for co-defendants have given the date of January 25, 2013, as an alternate date. There are facts that are pertinent to all defendants that would be helpful to the Court in its ruling, and these facts should be heard at one time.

IV

A single sentencing date of all parties, Defendants, Government and the Court would make a joint sentencing more judicially economical.

V

The Defendant respectfully request that this Court grant an extension for the aforementioned reasons and would show that the ends of justice would best be served by the granting of such continuance and that the granting of such continuance outweighs the best interest of the public and the Defendant to a speedy trial pursuant to Title 18 U.S.G.C., Section 3161(h)(8)(A).

VI

Counsel has spoken with the Assistant United States Attorney in this cause, James Sturgis, and he has no objection to this request.

VII

This motion is made in the interest of justice and not for the purposes of delay.

WHEREFORE, PREMISES CONSIDERED, Defendant requests this honorable Court to grant this **Unopposed Motion for Continuance** and reschedule this case until the 25th of January 2013.

Respectfully submitted,

/S/ Wendell A. Odom, Jr.
WENDELL A. ODOM, JR.
TBA #15208500
Federal Bar #947
Attorney for Defendant #3
Joel Paredes-Gomez

440 Louisiana, Suite 200
Houston, TX 77002

(713) 223-5575
(713) 224-2815 (FAX)

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **Unopposed Motion for Continuance** was filed electronically with the United States District Court Clerk and same was electronically forwarded to the Assistant United States Attorney as well as to counsel as identified below on this the 6th day of November, 2012.

/S/ Wendell A. Odom, Jr.
WENDELL A. ODOM, JR.

Adrian Almaguer
TBA #01107900
Federal Bar #12840
3208 White Oak Dr.
Houston, Texas 77007
(713) 861-1392
Attorney for Defendant #2
Myra Lorena Orellana-Morales

Winston E. Cochran, Jr.
TBA #04457300
Federal Bar #14490
P.O. Box 38465
Houston, TX 77238
(713) 228-0264
Attorney for Defendant #4
Aurora Ruiz

R. Christopher Goldsmith
TBA #08097320
Federal Bar #12080
440 Louisiana St., Suite 900
Houston, TX 77002
(713) 223-1001
Attorney for Defendant #5
Aurelio Mosquera

Steven J. Golembe
Federal Bar #137225
2340 South Dixie Highway
Coconut Grove, FL 33133
(305) 858-0404
Attorney for Defendant #6
John Alex Marroquin-Patino

Don L. Lambright
TBA #11849000
Federal Bar #1485
440 Louisiana St., Suite 200
Houston, TX 77002
(713) 223-4949
Attorney for Defendant #6
John Alex Marroquin-Patino

CERTIFICATE OF CONFERENCE

Counsel for Defendant has spoken to the Assistant United States Attorney in this cause, James H. Sturgis, and he has no objection to a continuance.

/S/ Wendell A. Odom, Jr.
WENDELL A. ODOM, JR.